



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

833099  
PHELAN HALLINAN DIAMOND & JONES, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
856-813-5500  
Attorneys for Secured Creditor: FREEDOM  
MORTGAGE CORPORATION

Order Filed on March 30, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:

Kevin Michael O'Connor

Case No: 19-31145 - CMG

Hearing Date: 03/04/2020

Judge: Christine M. Gravelle

**CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION**

The consent order set forth on the following pages, numbered two (2) and three (3) is hereby  
**ORDERED.**

**DATED: March 30, 2020**

A handwritten signature in black ink, appearing to read "Christine M. Gravelle".

**Honorable Christine M. Gravelle  
United States Bankruptcy Judge**

**NJID 833099**

PHELAN HALLINAN DIAMOND & JONES, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
856-813-5500  
Attorneys for FREEDOM MORTGAGE CORPORATION

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE:

Kevin Michael O'Connor

Case No. 19-31145 - Cmg

Debtor

Chapter 13

Consent Order Resolving  
Objection To Confirmation

Hearing Date: 03/04/2020

This Consent Order pertains to the property located at 115 Hawthorne Street, Neptune, NJ 07753, mortgage account ending with "1706";

THIS MATTER having been brought before the Court by William H. Oliver, Jr., Esquire attorney for debtor, KEVIN MICHAEL O'CONNOR, upon the filing of a Chapter 13 Plan, FREEDOM MORTGAGE CORPORATION by and through its attorneys, Phelan Hallinan Diamond & Jones, PC having filed an Objection to the Confirmation of said Chapter 13 Plan and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

IT IS ORDERED as follows:

1. Freedom Mortgage Corporation has filed a valid, secured Proof of Claim in the amount of \$34,193.98.
2. The Trustee is authorized to disburse on the secured arrearage claim of Freedom Mortgage Corporation in the amount of \$34,193.98 (Claim 2-1) pending Debtor potentially completing a loan modification. Should the debtor qualify for a loan modification, the loan modification must be approved no later than **May 6, 2020**
3. If Loan Modification is approved, Freedom Mortgage Corporation shall file an Amended Proof of Claim showing the amount of arrears paid to date by the Trustee.

4. If a loan modification is not approved by **May 6, 2020**, the debtor shall do one of the following: 1) file a Modified Plan to cure the arrearage claim of Movant; or 2) file a Modified Plan to surrender the property subject to said claim; or 3) a Notice to Convert to Chapter 7; or 4) a Notice to Dismiss Case.

5. Debtor shall tender adequate protection payments to Freedom Mortgage Corporation as required by the Loss Mitigation Program (LMP). The adequate protection payments will continue only while the Debtor is in LMP. The Loss Mitigation Program is scheduled to terminate on **May 6, 2020**. If the Debtor fails to make adequate protection payments, Freedom Mortgage Corporation will file an Application for Early Termination of LMP. Once the Loss Mitigation Program terminates on **May 6, 2020**, or an earlier date confirmed by the court, the Debtor shall cease tendering the reduced adequate protection payments and begin making regular monthly mortgage payments to Freedom Mortgage Corporation as required by the mortgage and note.

6. This Consent Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,  
Content and entry of the within Order:

PHELAN HALLINAN DIAMOND & JONES, PC  
Attorneys for Secured Creditor:  
FREEDOM MORTGAGE CORPORATION

/s/ Robert J. Davidow  
Robert J. Davidow, Esq.  
Phelan Hallinan Diamond & Jones, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
Tel: 856-813-5500 Ext. 47960  
Fax: 856-813-5501  
Email: Robert.Davidow@phelanhallinan.com

Dated: 3/19/2020

/s/ William H. Oliver Jr.  
William H. Oliver, Jr., Esquire  
Attorney for Debtor

Dated: 3/19/2020

In re:  
Kevin Michael O'Connor  
Debtor

Case No. 19-31145-CMG  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-3

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Mar 30, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 01, 2020.

db Kevin Michael O'Connor, 115 Hawthorne Street, Neptune, NJ 07753-3917

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. NONE.

TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 01, 2020

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 30, 2020 at the address(es) listed below:

Albert Russo docs@russotrustee.com  
Andrew L. Spivack on behalf of Creditor FREEDOM MORTGAGE CORPORATION nj.bkecf@fedphe.com  
Denise E. Carlon on behalf of Creditor Toyota Motor Credit Corporation dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com  
Robert Davidow on behalf of Creditor FREEDOM MORTGAGE CORPORATION nj.bkecf@fedphe.com  
Robert W. Keyser on behalf of Creditor BB 316 Investments, LLC rkeyser@taylorandkeyser.com  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov  
William H. Oliver, Jr. on behalf of Debtor Kevin Michael O'Connor courtdocs@oliverandlegg.com, R59915@notify.bestcase.com

TOTAL: 7